

# EXHIBIT E

1 Q. Uh-huh.

2 A. And I did. I called Jeremy.

3 Q. Is that all the two of you discussed?

4 A. I believe so.

5 Q. You can't recall anything?

6 A. I can't recall anything else.

7 Q. Yvette had no reaction to you telling  
8 her that someone said that they were out to get  
9 her?

10 MS. MALLOY: Objection.

11 A. Obviously, she was concerned.

12 Q. Well, how did she express her concern?

13 A. I don't have an answer for that. I  
14 mean I could hear that she was concerned.

15 Q. How could you hear? What were you  
16 hearing?

17 A. Just -- I don't know how to describe,  
18 you know, an emotion in a voice. I don't know  
19 how to describe that.

20 Q. Uh-huh, okay. Did she indicate that  
21 she was going to call Ideal also? Did she make  
22 any reference to that?

23 A. I don't recall that.

24 Q. She just directed you to?

1 question.)

2 MS. MALLOY: Do you have my objection  
3 on there to the form of the question and the  
4 fact that it's argumentative?

5 REPORTER: Yes.

6 MS. MALLOY: Okay, I just want to make  
7 sure.

8 MS. CLEMONS: Mine too, because it  
9 assumes a fact not in evidence.

10 MR. FLETCHER: Go ahead.

11 A. I called Jeremy based on the  
12 information given to me by Carlos.

13 Q. But you hadn't even asked Carlos for  
14 the tape before calling Jeremy?

15 A. No, I did not.

16 Q. All right, did you get ahold of  
17 Mr. Leaman?

18 A. Yes.

19 Q. All right, what did you tell him?

20 A. I told him that I have been informed  
21 that Will Hanson was recording in our store and  
22 it's a violation of Lowe's company policies to  
23 record for any reason in our store. I don't  
24 recall verbatim what Jeremy may have said at that

1 time.

2 Q. Well, tell me in a general way what  
3 you believe he said.

4 A. Okay.

5 MS. MALLOY: Don't guess, please. You  
6 were instructed about depositions. I am  
7 going to ask you not to guess.

8 BY MR. FLETCHER:

9 Q. I want your best recollection. It  
10 does not have to be verbatim, but it does have to  
11 be complete. Go ahead.

12 A. Jeremy told me he would take care of  
13 it, and he asked me if Will could work that day.  
14 I told him at that time that I would prefer not.

15 Q. Did you take it to mean that he wanted  
16 to know if Will could finish up that day's work?

17 A. Um, as far as I presumed that would  
18 mean that, but I don't know if that's what he was  
19 implying.

20 Q. Well, were you telling him, when you  
21 said "I prefer not," were you expecting that he  
22 would remove him from the premises then and  
23 there?

24 A. Yes.